

Vincent P. Slusher
State Bar No. 00785480
vincent.slusher@dlapiper.com
DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 743-4572
Facsimile: (972) 813-6267

Thomas R. Califano (*Admitted Pro Hac Vice*)
thomas.califano@dlapiper.com
Jeremy R. Johnson (*Admitted Pro Hac Vice*)
jeremy.johnson@dlapiper.com
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, New York 10020-1104
Tel: (212) 835-6000
Fax: (212) 835-6001

PROPOSED ATTORNEYS FOR THE DEBTORS
AND DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	CASE NO. 09-37010
	§	
ERICKSON RETIREMENT	§	CHAPTER 11
COMMUNITIES, LLC, et al.¹	§	
Debtors.	§	Joint Administration Pending

NOTICE OF HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on October 22, 2009, the above-captioned debtors and debtors in possession (the “Debtors”) filed the following motions (the “October 22 Motions”) with the United States Bankruptcy Court for the Northern District of Texas (the “Bankruptcy Court”) A hearing on these Motions will be heard at **9:30 a.m. (prevailing**

¹ The Debtors in these Chapter 11 cases are Erickson Retirement Communities, LLC, Ashburn Campus, LLC, Columbus Campus, LP, Concord Campus GP, LLC, Concord Campus, LP, Dallas Campus GP, LLC, Dallas Campus, LP, Erickson Construction, LLC, Erickson Group, LLC, Houston Campus, LP, Kansas Campus, LLC, Littleton Campus, LLC, Novi Campus, LLC, Senior Campus Services, LLC, Warminster Campus GP, LLC, Warminster Campus, LP.

Central Time) on October 29, 2009 at the Bankruptcy Court located on the 14th Floor of 1100 Commerce Street, Dallas, TX 75242-1496 (the “Bankruptcy Court”):

- Debtors’ Motion For Interim And Final Orders (I) Authorizing Debtors To Obtain Postpetition Financing On A Senior Secured Superpriority Basis Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, And 364; (II) Granting Adequate Protection To Prepetition Secured Lenders Pursuant To 11 U.S.C. §§ 361, 363 And 364; (III) Scheduling A Final Hearing Pursuant To Bankruptcy Rule 4001(b) And (c); And (IV) Granting Related Relief; (the “DIP Motion”);
- Debtors’ Motion For An Order (I) Approving Break-Up Fee, Expense Reimbursement Payments To Plan Sponsor And Shop Provisions; (II) Approving Bidding Procedures For The Sale Of Substantially All Of The Debtors’ Assets; (III) Approving Procedures For Cure, Assumption And Assignment Of Contracts; (III) Scheduling Hearings To Consider Approval Of The Disclosure Statement And Solicitation Procedures And Forms Of Ballots And (B) Confirmation Of The Plan Of Reorganization; (IV) Establishing Deadlines To Object To The Disclosure Statement And Plan Of Reorganization; And (V) Granting Related Relief, (the “Scheduling Motion”); and
- Debtors’ Motion For An Order Authorizing Debtors To Escrow Initial Entrance Deposits (the “IED Escrow Motion”).

PLEASE TAKE FURTHER NOTICE that a Second Interim Hearing will be held at **9:30 a.m. (prevailing Central Time) on October 29, 2009** at the Bankruptcy Court, on the following motions (the “Cash Collateral Motions”):

- Motion of Ashburn Campus, LLC, Columbus Campus, LP, Concord Campus, LP, Dallas Campus, LP, Houston Campus, LP, Kansas Campus, LLC, Littleton Campus, LLC, Novi Campus, LLC, and Warminster Campus, LP For Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection to Secured Lenders, and (III) Scheduling a Final Hearing; and
- Motion of ERC For Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection to Secured Lenders, and (III) Scheduling a Final Hearing.

PLEASE TAKE FURTHER NOTICE that a Final Hearing will be held at **9:30 a.m. (prevailing Central Time) on October 29, 2009** at the Bankruptcy, on the following (the “Cash Management Motion”):

- Motion of Debtors For Order Authorizing (I) Continued Use of Existing Cash Management System, (II) Maintenance of Existing Bank Accounts, (III) Continued Use of Existing Business Forms, and (IV) Maintenance of Existing Investment Practices.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the October 22 Motions, the Cash Collateral Motions and the Cash Management Motion shall be heard during the Hearing.

PLEASE BE ADVISED that copies of the petitions or Motions may be obtained by contacting the undersigned, or may be found on the Court's website at <https://ecf.txnb.uscourts.gov/> or at www.bmcgroup.com. All requests for information concerning the Motions should be directed to the undersigned.

Dated: October 23, 2009
Dallas, Texas

DLA PIPER LLP (US)

By: /s/ Vincent P. Slusher
Vincent P. Slusher
State Bar No. 00785480
vincent.slusher@dlapiper.com
DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 743-4572
Facsimile: (972) 813-6267

Thomas R. Califano (*Admitted Pro Hac Vice*)
thomas.califano@dlapiper.com
Jeremy R. Johnson (*Admitted Pro Hac Vice*)
jeremy.johnson@dlapiper.com
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, New York 10020-1104
Tel: (212) 835-6000
Fax: (212) 835-6001

Proposed Attorneys for the Debtors and
Debtors in Possession